

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

STANDARD INSURANCE COMPANY

CASE NO. 10-276

v.

JUDGE: WALTER

**LORI PILKINTON,
MAUREEN TOBIN STANLEY
MARGARET M. TOBIN, and
JOSEPH DAVID TOBIN**

MAGISTRATE: HORNSBY

ANSWER OF MARGARET TOBIN

COMES NOW Defendant Margaret M. Tobin, by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 12, and answers Plaintiff's Complaint for Interpleader as follows:

1. Margaret Tobin admits the allegations of paragraph 1 of Plaintiff's Complaint.
2. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 2 of Plaintiff's Complaint.
3. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 3 of Plaintiff's Complaint.
4. Margaret Tobin admits the allegations of paragraph 4 of Plaintiff's Complaint.
5. Margaret Tobin admits the allegations of paragraph 5 of Plaintiff's Complaint.
6. Margaret Tobin admits the allegations of paragraph 6 of Plaintiff's Complaint.
7. Margaret Tobin admits the allegations of paragraph 7 of Plaintiff's Complaint.
8. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 8 of Plaintiff's Complaint.
9. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 9 of Plaintiff's Complaint.

10. Margaret Tobin admits the allegations of paragraph 10 of Plaintiff's Complaint.
11. Margaret Tobin admits the allegations of paragraph 11 of Plaintiff's Complaint.
12. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 12 of Plaintiff's Complaint.
13. Margaret Tobin admits the allegations of paragraph 13 of Plaintiff's Complaint.
14. Margaret Tobin admits the allegations of paragraph 14 of Plaintiff's Complaint.
Margaret Tobin would further state that, upon information and belief, Charles Pilkinton pled guilty to negligent homicide on May 14, 2010 to the death of Raymond Tobin.
15. Margaret Tobin admits the allegations of paragraph 15 of Plaintiff's Complaint.
16. Margaret Tobin admits the allegations of paragraph 16 of Plaintiff's Complaint.
17. Margaret Tobin admits the allegations of paragraph 17 of Plaintiff's Complaint.
18. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 18 of Plaintiff's Complaint.
19. Margaret Tobin admits the allegations of paragraph 19 of Plaintiff's Complaint.
20. Margaret Tobin is without sufficient information to admit or deny the allegations of paragraph 21 of Plaintiff's Complaint.
21. Margaret Tobin admits the allegations paragraphs 1-7 of the paragraph beginning "WHEREFORE, Standard requests the following" on page 5 of Plaintiff's Complaint, except Margaret Tobin denies the allegations of paragraph 5-7, specifically denying standard is entitled to any costs or attorney's fees as a stakeholder.

NOTICE OF CLAIM

COMES NOW Margaret Tobin, and gives notice of her claim to one-third of the insurance proceeds of Standard Insurance Company's Group Accidental Death and Dismemberment Insurance Policy 641797-A, as a child of Raymond Tobin.

Respectfully submitted,

**Robein, Urann,
Spencer, Picard & Cangemi, A.P.L.C.**

s/ Christina L. Carroll

Christina L. Carroll (Bar No. 29789)

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Attorney for Plaintiff, Margaret M. Tobin

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2010, I electronically filed the foregoing with the Clerk of the Court using ECF system which sent notification of such filing to the following:

Jennifer M. Lawrence, Esq.
Preaus, Roddy & Associates, LLC
650 Poydras St.
Suite 2125
New Orleans, Louisiana 70130

Michael Allyn Stroud
Wiener Weiss & Madison
P O Box 21990
Shreveport, LA 71120-1990

Following are non-ECF participants, which were served with the above and foregoing via U. S. Mail, postage pre-paid and properly addressed:

Maureen Tobin Stanley
906 Grand View Ave
Duluth, MN 55812

Joseph David Tobin
705 Quacker Cr Apt 6
Lewisberry, PA 17339

s/Christina L. Carroll
Christina L. Carroll